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Federal-State Joint Board on)
Universal Service)
_____)

CC Docket No. 96-45
DA No. 98-2410

AT&T COMMENTS ON JOINT BOARD SECOND RECOMMENDED DECISION

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SUMMARY

Local exchange carriers have long been gouging interexchange customers and their carriers by charging vastly inflated access charges that exceed by a massive amount their true cost of providing access and any subsidies needed to support universal service. AT&T welcomes the Joint Board's proposed approach which would properly determine the need for high cost support on an efficient basis and allow the Commission to remove any implicit subsidies and the surplus profits embedded in interstate access charges. This reform is not only long overdue, it is an essential predicate to enable the local competition objective of the 1996 Act to be realized.

AT&T shows in Part I that the Joint Board has correctly balanced the need to support the provision of telephone service in high cost areas while taking steps to ensure that the support system does not over-burden consumers across the nation. First, the Board's proposal to replace the 25/75 federal/state jurisdictional responsibility for high cost support with a two-step process that considers (1) whether the cost of serving a study area is significantly above the national average, and (2) if so, whether the state has sufficient resources to provide the support needed, would appropriately make federal support available only to the extent that a state is unable to support its high cost areas through its own reasonable efforts.

Second, in reaffirming that the need for support should be determined on the basis of forward-looking economic costs, the Board ensures that the USF system will provide the correct signals for new competitive entry, investment and innovation and will not reward inefficiency. The Board's proposal to use a federal cost model or "national yardstick" is fair to all states and best comports with the Act's rate comparability requirements in that it measures each state's need for support on a consistent basis.

Third, the Board's recommendation that federal support should be determined initially by measuring costs at the study area level (rather than the wire center level as the Commission had adopted in the Universal Service Order) is entirely correct. Calculation of subsidies at the wire center level would result in a larger fund because it fails to take into account the mitigating impact of low cost wire centers in the same study area.

As AT&T demonstrates in Part II, assessing both interstate and intrastate revenues for federal high cost support would broaden the contribution base for the USF and ensure the necessary funding, while lowering the assessment rates needed to fund the support mechanism and also eliminating potential misclassification problems. AT&T supports the Board's parallel proposal to permit states likewise to assess both intrastate and interstate revenues if a state opts to create an explicit state USF, provided the state reduces its intrastate access charges to the extent of

the state USF. Similarly, any increases to the federal USF should be offset by commensurate interstate access charge reductions.

As to the Board's suggestions for ensuring truthful communications between carriers and their customers, AT&T believes that existing market forces provide reputable carriers with powerful and ample incentives to communicate truthfully and in a non-misleading manner with their customers. To the extent a few unscrupulous carriers fail to do so, the Commission can and should exercise its enforcement authority under Section 201(b). At bottom, many of the Joint Board's concerns and, indeed, those of the industry, would be resolved if the Commission were to adopt a simultaneous assessment and recovery mechanism that would be assessed against carriers' retail services and collected by carriers from their retail customers. However, if the Commission does not direct the simultaneous assessment and recovery of USF charges on a flat, per-line basis (or on a combined revenue basis), it should not adopt the Joint Board's recommendation that carriers recover no more than their USF assessment from end users through a separate charge. So long as carriers are responsible for the USF contribution whether or not their end user customers pay the carrier, carriers must be given latitude to design a rate structure that allows them to recoup their USF contribution costs.

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AT&T COMMENTS ON JOINT BOARD SECOND RECOMMENDED DECISION

Pursuant to the Commission's Public Notice released November 25, 1998 (DA 98-2410), AT&T Corp. ("AT&T") hereby submits these comments on the Joint Board's Second Recommended Decision, FCC 98J-7, released November 25, 1998 in the above-captioned docket.¹ AT&T supports the key features of the Joint Board's proposals which, in large measure, recommend reasonable procedures to ensure that federal universal service fund ("USF") high cost support for non-rural local exchange carriers ("LECs") will enable local rates in high cost serving areas to remain affordable and reasonably comparable as competition develops, but that the USF will be no larger than necessary to meet the universal service goals of the Telecommunications Act of 1996 ("Act").²

¹ Unless otherwise noted, all paragraph references herein are to the Joint Board's Second Recommended Decision.

² At the same time and as AT&T has previously shown, the major non-rural local exchange carriers (namely, the BOCs, GTE and SNET) should not receive any payments under the USF high cost program because these carriers have not undertaken to open their local markets to competition as contemplated by the 1996 Telecommunications Act and generally have sufficient funds to support their own high cost needs. See J. Lubin, AT&T, Presentation to CC Docket No. 96-45

(footnote continued on following page)

I. THE JOINT BOARD RECOMMENDATIONS PROPERLY RECOGNIZE THE NEED TO IMPLEMENT A HIGH COST SUPPORT MECHANISM THAT SUSTAINS UNIVERSAL SERVICE AND DOES NOT UNREASONABLY BURDEN CONSUMERS NATIONWIDE.

The Joint Board expressly recognizes that with the transition to a competitive environment and consistent with the 1996 Act, the Commission must balance two goals:

"(1) supporting high cost areas so that consumers there have affordable and reasonably comparable rates;³ and (2) maintaining a support system that does not, by its sheer size, over-burden consumers across the nation" (para. 3). The Joint Board recommendations correctly balance these goals in several critical respects.

First, the Board proposes to replace the 25/75 federal/state jurisdictional responsibility for high cost support adopted in the Commission's May 8, 1997 Universal Service Order,⁴ with a two-step process that would require the Commission to determine: (1) whether the cost of serving a

(footnote continued from previous page)

Universal Service En Banc on 25/75 Federal/State Responsibility for High Cost Support, March 6, 1998; AT&T Comments on Proposed Methods for Determining High Cost Support, filed May 15, 1998, in CC Docket Nos. 96-45 and 97-160, at 4-7. In no event should the Commission, under the guise of a "hold harmless" approach, guarantee to these carriers greater support than that required by measuring the need for such support on a forward-looking economic cost basis at the study area level.

³ See 47 USC § 254(b)(3).

⁴ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 97-150, released May 8, 1997 ("Universal Service Order").

study area is significantly above the national average, and (2) if so, whether the state has sufficient resources to provide the support needed. Federal support would be provided only to the extent that a state would be unable to support its high cost areas through its own reasonable efforts (paras. 3-5). This two-step approach, in contrast to the Commission's 25/75 allocation, appropriately takes into consideration the ability of a state to fund its share of universal service support.

Second, in quantifying the need for support, the Joint Board reaffirms the Commission's findings that federal universal service support should be based on forward-looking economic costs, as opposed to the incumbent's embedded costs of providing supported services, in order "to send the correct signals for entry, investment and innovation."⁵ As the Commission found, use of forward-looking economic costs would preserve and advance universal service and encourage efficiency because costs will be based on the costs of an efficient carrier.⁶ By contrast, use of embedded costs would reward LEC inefficiency, provide windfall subsidies to incumbents that could be used to thwart competitive entry, encourage uneconomic entry based on bloated subsidies, and burden consumers nationwide who must pay for the program. The Board also

⁵ Second Recommended Decision, para. 28, citing Universal Service Order, paras. 224 and 273.

⁶ Universal Service Order, para. 225.

recommends that the Commission reconsider its decision to allow state cost studies to be used in place of a federal cost model, so that a "national yardstick" would be used to establish a nationwide method of determining cost and measuring rate comparability (para. 31). Use of a national cost model is fair to all states and best comports with the Act's rate comparability requirements in that it measures each state's need for support on a consistent basis.

Third, the Joint Board recommends that federal support should initially be determined by measuring costs at the study area level (rather than the wire center level as the Commission had adopted in the Universal Service Order, para. 193). It finds that support calculated at the study area level "will properly measure the support responsibility that ought to be borne by federal mechanisms given the current extent of local competition" and that a federal mechanism that reduces cost disparities among study areas and states will be sufficient to maintain rate comparability and affordability (para. 33). The Joint Board recognizes that as competition develops within a study area, it may be necessary to calculate costs at a lower level of aggregation (*id.*).

The Joint Board recommendation that the need for support should be calculated at the study area level is entirely correct. Calculation of subsidies at the wire center level would result in a larger fund because it fails to take into account the mitigating impact of low cost wire centers in the same study area. Because of this fact, providing support

on a wire center basis (even under the 25/75 approach) would dramatically enlarge the size of the existing federal high cost mechanisms for non-rural LECs, expanding the USF by *half a billion dollars* for non-rural LECs according to the HAI model.⁷ An increase of this magnitude would entirely unnecessarily jeopardize political support for the USF program.

There is no justification for the wire center approach. As the Commission itself recognized in the Universal Service Order (para. 251 and n.669), universal service support should not be calculated at a greater level of geographic disaggregation than unbundled network elements ("UNEs") are. The majority of states have established a single, statewide rate for UNEs, and certainly no state has disaggregated UNE rates to the wire center level. Thus, a wire center approach would inevitably create opportunities for arbitrage. *Id.* at n.669. Indeed, because of the lack of competition, there is absolutely no need to calculate support at anything other than the study area level.

In short, the Joint Board's "plan [as outlined above] can enable reasonably comparable rates if the combination of state and federal support can keep the net cost differences (after receipt of universal service support) between high and low cost areas within reasonable bounds" (para. 50).

⁷ See AT&T Comments on Proposed Methods for Determining High Cost Support, filed May 15, 1998, in CC Docket Nos. 96-45 and 97-160, at 8, see generally id. at 7-13.

Commission adoption of the Joint Board's above recommendations should go far in achieving that statutory objective.

II. THE JOINT BOARD RECOMMENDATIONS CONCERNING THE ASSESSMENT AND RECOVERY OF USF CONTRIBUTIONS CONTAIN A NUMBER OF USEFUL SUGGESTIONS THAT, IF ADOPTED, WOULD RESOLVE SIGNIFICANT ISSUES ASSOCIATED WITH THE CURRENT USF ASSESSMENT AND RECOVERY MECHANISMS.

The Joint Board recommends that the Commission include both interstate and intrastate telecommunications revenues in the assessment base for the high cost and low-income components of the USF rather than confining the assessment solely to interstate revenues, as the Commission had done in the Universal Service Order (paras. 824-841). Assessing combined revenues would have several important benefits. First, it would broaden the contribution base for the USF and ensure the necessary funding, while lowering the assessment rates needed to fund the support mechanism. Second, it would avoid the problem of requiring carriers, such as wireless carriers, that do not routinely separate revenues for regulatory and business purposes from having to do so and eliminate any potential misclassification by carriers of revenues to minimize their USF assessment.⁸

⁸ The problems of wireless carriers in identifying their interstate revenues are sufficiently complex that they are currently the subject of a separate further notice of proposed rulemaking. Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, FCC 98-278, released October 26, 1998.

The Joint Board further recommends that if the Commission decides to assess combined revenues for federal USF high cost support, it should similarly permit states to assess interstate revenues for the purposes of funding USF support if a state opts to create an explicit state USF (para. 63). AT&T endorses this approach provided that the state reduces its intrastate access charges.⁹ Allowing states to assess interstate revenues billed in the state in return for corresponding offsets against intrastate access (or, if the state fails to do so, interstate access) would ameliorate the impact of a smaller federal USF on any given state and tend to minimize the high cost funding burden on a state's intrastate services.¹⁰

Alternatively to a revenue assessment, the Joint Board suggests that the Commission consider assessing carriers' high cost support on a flat, per-line basis, which also addresses some of the difficulties of assessing only interstate revenues (para. 63). For example, it would solve the problem of wireless carriers having to identify their interstate revenues. It would also obviate the problem of whether Internet services revenues should be subject to USF assessments because all lines (including those used whole or in part to reach the Internet) would be subject to support obligations.

⁹ Similarly, any increases to the federal USF should be offset by commensurate interstate access charge reductions.

¹⁰ See AT&T Opposition to Petitions for Reconsideration, filed August 18, 1998, in CC Docket 96-45, at 6-7.

As to how USF support is recovered by carriers from their customers, the Joint Board suggests that, in the interests of ensuring truthful communications between carriers and their customers, the Commission prohibit carriers from characterizing their USF funding obligation as a "tax" or "federally mandated," because pursuant to the Universal Service Order and the Joint Board's instant recommendations carriers have the option whether or not to pass through the charge as a line-item on the bill (paras. 68-70). The Board also suggests that the Commission consider standard nomenclature such as "Federal Carrier Universal Service Contribution" to describe line-items on consumer bills (para. 72). The Board further recommends that any line-item USF assessment be no greater than the carrier's USF assessment rate so that no class of customer is disadvantaged by being charged excessively (para. 69).

As AT&T explained in its Truth-in-Billing Format Reply, filed December 16, 1998, in CC Docket 98-170 (at 3-4), existing market forces provide reputable carriers with powerful and ample incentives to communicate truthfully and in a non-misleading manner with their customers. To the extent a few unscrupulous carriers fail to do so, the Commission can and should exercise its enforcement authority under Section 201(b) rather than micromanaging all interstate carriers' billing practices. *Id.* at 5. To the extent billing guidelines are desirable, they should be established through industry forums that would include all relevant service providers. *Id.* at 6-7.

At bottom, many of the Joint Board's concerns and, indeed, those of the industry would be resolved if the Commission were to adopt a simultaneous assessment and recovery mechanism that would be assessed against carriers' retail services and collected by carriers from their retail customers. Such a recovery mechanism would meet the Joint Board's concern that all carriers collect and recover their USF obligations in the same manner without any discretion on the part of the carrier as to how recovery will be made between different classes of customers; and it would ensure competitive neutrality by eliminating the ILEC flowback which requires interexchange carriers ("IXCs") to recover not only their direct USF assessment from their retail customers but also the ILECs' USF assessment which is passed on to IXCs through interstate access charges.

However, if the Commission does not direct the simultaneous assessment and recovery of USF charges on a flat, per-line basis (or indeed, on a combined revenue basis), it should not adopt the Joint Board's recommendation that carriers recover no more than their USF assessment from end users through a separate charge. For one, this would improperly interfere with the needs of carriers to recover uncollectible amounts associated with their USF obligation. For another, given that USF assessments are based on historical revenues, carriers with declining revenues must recover their USF obligations from their customers at a rate higher than the assessment rate to fund their USF contribution amount. So long

as carriers are responsible for the USF contribution whether or not their end user customers pay the carrier, carriers must be given latitude to design a rate structure that fully compensates them for their USF costs.

In suggesting that carriers should have discretion to recover through a line-item charge less but not more than their USF assessment, the Joint Board appears to believe that carriers have the ability to compete away USF subsidies. This is a fallacy because all carriers are required to contribute into the fund on the same basis and that fact will not, and indeed cannot, change by a carrier increasing its efficiency in a competitive market.¹¹ In short, in the absence of the significant benefits otherwise associated with the simultaneous assessment and recovery approach, it would be entirely inappropriate for the Commission to constrain carriers' ability to design reasonable rate recovery mechanisms by insisting that uncollectible amounts and other administrative costs be hidden in service charges.

¹¹ Nonetheless, price cap LECs' USF-related exogenous adjustments should be subject to the X-Factor to help ensure that they do not vastly over-recover their USF obligations from their IXC wholesale access customers. Indeed, because of demand growth, LECs may over-recover their USF obligations even if the X-Factor is applied. See AT&T Comments on SBC Waiver Request, filed April 2, 1998, CCB/CPD 98-19, DA 98-559.

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CONCLUSION

For the reasons and in the manner stated above, the Commission should adopt the Joint Board's Second Recommended Decision.

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December 23, 1998

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 23rd day of December, 1998, a copy of the foregoing "AT&T Comments on Second Joint Board Recommended Decision" was served via U.S. first class mail, postage prepaid, to the parties on the attached Service List.

A handwritten signature in cursive script, reading "Rena Martens", is written over a horizontal line.

Rena Martens

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